

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

BMO HARRIS BANK N.A.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 1:14-CV-1187
)	
THE TRULAND GROUP, INC.,)	
)	
TRULAND SYSTEM CORPORATION,)	
)	
PEL-BERN ELECTRIC CORPORATION,)	
)	
BLUMENTHAL KAHN)	
TRULAND ELECTRIC, LLC,)	
)	
TECH, INC.,)	
)	
THE TRULAND GROUP)	
OF COMPANIES, CORP.,)	
)	
SNOWDEN RIVER CORPORATION,)	
)	
TRULAND SERVICE CORPORATION,)	
)	
TRULAND WALKER SEAL)	
TRANSPORTATION, INC.,)	
)	
NORTHSIDE TRULAND)	
ELECTRIC, LLC,)	
)	
<i>Defendants.</i>)	
)	

RECEIVER'S MOTION TO ESTABLISH WIND DOWN PROCEDURES

COMES NOW, Raymond A. Yancey, Receiver (the "Receiver"), by his undersigned counsel, and makes this Motion to Approve Wind Down Procedures.

As set forth more fully in the accompanying Memorandum in Support of Receiver's Motion to Establish Wind Down Procedures, and in order to facilitate the timely and efficient wind down of the Receivership Estate,¹ the Receiver seeks an order 1) providing notice to all interested parties of the Receiver's intent to terminate the Receivership; 2) permitting the Receiver to terminate a lease and abandon all books and records and other tangible property of Truland belonging to the Receivership Estate; and 3) granting such other and further relief as the Court deems just and proper.

Dated: December 21, 2017

Respectfully submitted,

/s/ Erika L. Morabito

Erika L. Morabito (VA Bar No. 44369)
Brittany J. Nelson (VA Bar No. 81734)
Foley & Lardner, LLP
3000 K Street, NW, Suite 600
Washington, DC 20007-5109
Phone: 202-672-5300
Fax: 202-672-5399

Attorneys for Receiver Raymond A. Yancey

¹ All capitalized terms not defined herein have the meaning ascribed to them in the Memorandum in Support of the Motion for Wind Down Procedures, filed concurrently herewith.

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2017, I caused the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Erika L. Morabito
Erika L. Morabito (VA Bar No. 44369)
Foley & Lardner, LLP
3000 K Street, NW, Suite 600
Washington, DC 20007-5109
Phone: 202-672-5300
Fax: 202-672-5399

Attorney for Receiver Raymond A. Yancey